Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of	)	
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End User Common Line Charges	)	CC Docket No. 95-72
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To: The Commission

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COMMENTS OF NATIONAL PUBLIC RADIO, INC.

Introduction

National Public Radio, Inc. ("NPR") hereby submits its Comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding. Notice of Proposed Rulemakng, CC Docket No. 95-72, rel. May 30, 1995 ["NPRM"].

NPR is a non-profit, noncommercial membership organization dedicated to the development of a diverse public radio service for the American public. NPR provides programming, satellite interconnection, and representational services to more than 500 public radio stations across the United States. It produces and distributes such acclaimed programming as *All Things Considered, Morning Edition, Talk Of The Nation,* and *Performance Today.*

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List A B C D E

The Commission Should Revise its Local Loop Cost Recovery Rules To Avoid Inhibiting the Use of New Technology, Particularly By Those Involved in the Broadcast Distribution of Noncommercial Educational Radio Programming

The Commission initiated this proceeding to assess several critical issues raised by the application of multiple Subscriber Line Charges ("SLCs") to recover the cost of local loops used with Integrated Services Digital Network ("ISDN") and other services that permit the provision of multiple voice-grade-equivalent channels over T-1, DS-1 and other facilities. The Commission has expressed particular concern over the effect of its existing policy on interstate access competition and, indirectly, on the preservation of universal service.[1] While these issues are undeniably important, the Commission must carefully consider the manner in which local loop costs should be recovered to avoid undermining the deployment and use of ISDN and other beneficial new technologies on which NPR, its member stations, and others rely.[2]

Throughout most of its twenty-five year history, NPR and its member stations were often forced to rely on plain old telephone (POTS) transmission to conduct remote newsgathering. Inherent bandwidth limitations often required

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1 NPRM at ¶¶ 13-14; see also id. at ¶ 20 ("In the long run, inefficient bypass of the LEC networks by high volume toll customers could threaten to undermine the support flows that foster universal service.")

2 See id. at ¶ 17.

costly and often convoluted strategies to achieve reasonable aural quality.[3] Even under the best conditions, news filing costs were more than double that of a typical phone call and often required expensive conditioning, calibration, and quality control to achieve roughly 100 Hz to 5,000 Hz quality, with far less than broadcast quality signal-to-noise ratios.

Beginning in 1991, however, switched digital technology first became available to NPR via Switched-56 service. The equipment that could be used on these first circuits offered 50 Hz to 7.5 kHz frequency response and were an immediate and dramatic improvement over all previous methods of cost effective newsgathering. In that year, NPR's news headquarters facility routinely communicated with only twelve SW-56 news gathering locations.

By 1993, ISDN services were becoming available in targeted areas of the country and NPR's usage (as well as the rest of the industry's) exploded. Audio quality and frequency response due to advanced coding algorithms and wider bandwidth improved to nearly match the quality achieved on most newsgathering assignments. This resulted in field quality that was, finally, essentially studio

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[3] In the early 1980s, single line bandwidth extension systems permitted the shifting of the audio frequency spectrum prior to transmission, with reverse compensation during the receive process, to improve low frequency response of the field transmission. While this method was subsequently improved through a process of splitting the audio spectrum into two audio segments for transmission, this improvement also required two phone circuits. In addition, the audio quality, although improved, was still far short of the audio quality originally gathered and far short of the frequency response of the NPR network. Likewise, while NPR has resorted to other techniques, such as half-speed transmission, to achieve comparable results over a single circuit, these techniques required substantially more connect time.

quality. At the same time, costs continued to remain near that of traditional long distance calls.

Due in large measure to these developments, the number of newsgathering locations and audio feedpoints with which NPR's news headquarters now routinely communicates has increased to over 200 sites. NPR has installed ISDN circuits at locations worldwide and relies heavily on ISDN feeds for much of its newsgathering. Many NPR member stations use ISDN for regional newsgathering and news exchanging purposes. Moreover, NPR's member stations often rely on ISDN service as a back-up to dedicated studio-to-transmitter links (STL's) and other transmission links in their broadcast distribution infrastructures.

As the foregoing demonstrates, NPR, its member stations, and the public radio system as a whole have realized significant benefits from the recent development and deployment of switched digital services. If, however, the cost of using ISDN and other channelization technology substantially increases as a result of the Commission's local loop cost recovery rules, NPR and its member public radio stations will likely be forced to forego those benefits. Specifically, a substantial increase in the cost of ISDN service, such as through the application of multiple SLCs, would force NPR and its member stations either to devote increasingly scarce resources to the production and distribution of

noncommercial educational programming or, far more likely, to sacrifice the aural quality that has become the hallmark of public radio broadcasting in this country.[4]

Moreover, the downward pressure on demand among all users would likely produce a significant deceleration in the deployment of these advanced switched digital services. It is, therefore, essential that the Commission fully consider the implications of any proposed method of recovering local loop costs.[5] Otherwise, the Commission's local loop cost recovery rules may significantly, and unnecessarily, undermine the public interest, including by hampering the ability of the public radio system to maintain and improve the quality of service it provides to the American people.

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[4] NPRM at ¶ 36 (soliciting comment on the elasticity of demand for ISDN services and the advantages and disadvantages of alternative service and equipment configurations that offer communications capabilities comparable to those of ISDN).

[5] For instance, it is not entirely clear that, unless a separate SLC is applied to each channel in a T-1 or other single transmission facility, other charges must increase and interstate access competition will be substantially skewed. Rather, it may be that the overall increase in demand associated with the widescale deployment and low cost availability of ISDN and other services will produce overall benefits that outweigh the specific effect on competition between local exchange carriers and alternative access providers, and universal service would not be seriously jeopardized.

Conclusion

For the foregoing reasons, the Commission should seek to ensure that its local loop cost recovery rules do not inhibit the deployment and use of new technology and do not undermine the ability of the public radio system to produce and broadcast noncommercial educational radio programming.

Respectfully Submitted,

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